

**ENTERED**

March 13, 2024

Nathan Ochsner, Clerk

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>FIELDWOOD ENERGY III LLC, et al.</b>	§	<b>Case No. 20-33948 (MI)</b>
	§	
	§	<b>(Jointly Administered)</b>
<b>Post-Effective date Debtors.<sup>1</sup></b>	§	

**THIRD STIPULATION AND AGREED ORDER CONTINUING DEADLINE TO  
RESPOND TO PLAN ADMINISTRATOR'S OBJECTIONS TO CLAIMS OF NORTH  
AMERICAN SPECIALTY INSURANCE COMPANY N/K/A SWISS RE CORPORATE  
SOLUTIONS AMERICA INSURANCE COMPANY  
AND REQUEST TO RESET HEARING DATE**

[Related to Dkt. No. 2858]

David Dunn ("Administrator"), as Plan Administrator of Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, Fieldwood Energy Inc., GOM Shelf LLC and FW GOM Pipeline, Inc., Debtors (the "Post-Effective Date Debtors"); and North American Specialty Insurance Company n/k/a Swiss Re Corporate Solutions America Insurance Company ("NAS") and, collectively with Administrator, the "Parties")<sup>2</sup> submit this *Third Stipulation and Agreed Order to Continuing Deadline to Respond to Plan Administrator's Objections to Claims of North American Specialty Insurance Company n/k/a Swiss Re Corporate Solutions America Insurance*

---

<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494); Fieldwood Energy, Inc. (4991, GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore, LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date FWE I Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Offshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703; and Galveston Bay Processing LLC (0422).

<sup>2</sup> N/K/A Swiss Re Corporate Solutions America Insurance Company

*Company and Request to Reset Hearing* (the “Stipulation”) for entry by the Court, in which the Parties stipulate that:

1. WHEREAS, On August 3, 2020 and August 4, 2020 (as applicable, the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the United States Code (the “Bankruptcy Case”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”).

2. WHEREAS, on August 17, 2023, the Administrator filed an objection to NAS’ proofs of claim as further described in the objection filed at Docket No. 2858 (the “Objection”).

3. WHEREAS, on September 11, 2023, the Parties filed the *Stipulation and Agreed Order Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing Date* [Dkt No. 2875].

4. WHEREAS, on September 12, 2023, the Court entered the *Stipulation and Agreed Order Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing* [Dkt No. 2877].

5. WHEREAS on December 5, 2023, the Parties filed the *Second Stipulation and Agreed Order Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing Date* [Dkt No. 2978].

6. WHEREAS, on December 7, 2023, the Court entered the *Second Stipulation and Agreed Order Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing Date* [Dkt No. 2980].

7. WHEREAS, the hearing on the Objection is currently set for March 21, 2024 at 9:00 a.m.

8. WHEREAS, NAS’s response date to the Objection is currently March 12, 2024.


9. WHEREAS, the Parties have agreed to extend the deadline for NAS to respond to the Objections until Thursday, May 9, 2024 (the “Extended Response Deadline”).

10. WHEREAS, for the foregoing reasons, the Parties request a continuance of the March 21, 2024 hearing with respect to the Objection. The Administrator and NAS request the hearing be continued until after the Extended Response Deadline to a date that the Court is available.

NOW, THEREFORE, based upon the agreement of the Parties, and for good cause shown, it is hereby **ORDERED, ADJUDGED** and **DECREED** that:

1. The date for NAS to respond to the Objection is continued until May 9, 2024.
2. The hearing on the Administrator’s Objection [Dkt No. 2858] is set for May 21, 2024 at 10:30 a.m.

Signed: March 12, 2024

  
\_\_\_\_\_  
Marvin Isgur  
United States Bankruptcy Judge

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day  
and year first below written.

Dated: March 11, 2024

<b>BONDS ELLIS EPPICH SCHAFFER JONES LLP</b>  By: <u>/s/ Ken Green</u> Ken Green Texas State Bar No. 24036677 Aaron Guerrero Texas State Bar No. 24050698 Bryan Prentice Texas State Bar No. 24099787 950 Echo Lane, Suite 120 Houston, Texas 77024 Telephone: (713) 335-4990 Facsimile: (713) 335-4991 Email: <a href="mailto:ken.green@bondsellis.com">ken.green@bondsellis.com</a> <a href="mailto:aaron.guerrero@bondsellis.com">aaron.guerrero@bondsellis.com</a> <a href="mailto:bryan.prentice@bondsellis.com">bryan.prentice@bondsellis.com</a>  <b>ATTORNEYS FOR DAVID DUNN, THE PLAN ADMINISTRATOR FOR THE POST-EFFECTIVE DATE DEBTORS</b>	<b>THE LAW OFFICES OF T. SCOTT LEO, P.C. AND STRONG PIPKIN BISSELL &amp; LEDYARD LLP</b>  By: <u>/s/ Scott Leo</u> Scott Leo William Piper Ralph Kooy 100 N. LaSalle St., Suite 514 Chicago, IL 60602 Email: <a href="mailto:sleo@leolawpc.com">sleo@leolawpc.com</a> <a href="mailto:wpiper@leolawpc.com">wpiper@leolawpc.com</a> <a href="mailto:rkooy@leolawpc.com">rkooy@leolawpc.com</a>  -and-  K.B. Battaglini Two Riverway, Suite 1200 Houston, TX 77056 Email: <a href="mailto:kbattaglini@strongpipkin.com">kbattaglini@strongpipkin.com</a>  <b>ATTORNEYS FOR NORTH AMERICAN SPECIALTY INSURANCE COMPANY N/K/A SWISS RE CORPORATE SOLUTIONS AMERICA INSURANCE COMPANY</b>
---	---

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of March, 2024 a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Ken Green

Ken Green